

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS WELFARE AND)
PENSION FUNDS,)

Plaintiffs,)

v.)

MARLA LOCKETT-ROBINSON, Individually)
and d/b/a MYKA TRUCKING, LLC,)
an Illinois limited liability corporation not in)
good standing, and TENACITY)
TRANSPORTATION INC.)
an Illinois corporation)

Defendants.)

No. 2019 C 2755

Judge Robert M. Dow, Jr.

Magistrate Judge Cox

**MOTION FOR JUDGMENT IN SUM CERTAIN
ON COUNTS I, II AND III**

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain on Counts I, II and III as stated in this Motion and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on April 24, 2019 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).

2. Service was made upon MARLA LOCKETT-ROBINSON, Individually and d/b/a MYKA TRUCKING, LLC., an Illinois limited liability corporation not in good standing on May 17, 2019 and a copy of the proof of service was filed with the court on May 20, 2019.

3. Defendant is now in default on the Complaint and as supported by the attached Affidavits the sums due are:

\$1,261.43 Defaulted Pension Fund installment note payments
\$1,518.00 Defaulted Welfare Fund installment note payments
\$15,714.92 Pension Fund Audit May 19, 2017
\$15,333.25 Welfare Fund Audit May 19, 2017
\$1,250.00 Attorneys fees
\$497.00 Court costs
\$35,574.60

WHEREFORE, Plaintiffs pray for:

A. Entry of judgment against Defendant, MARLA LOCKETT-ROBINSON, Individually and d/b/a MYKA TRUCKING, LLC, an Illinois limited liability corporation not in good standing on Count I of the Complaint in the amount of \$2,779.13 and MARLA LOCKETT-ROBINSON, on Count II of the Complaint, jointly and severally, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$2,779.13.

B. Entry of judgment against Defendant, MARLA LOCKETT-ROBINSON, Individually and d/b/a MYKA TRUCKING, LLC, an Illinois limited liability corporation not in good standing on Count III of the Complaint in the amount of \$31,048.18, jointly and severally, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$31,048.17.

C. Grant Plaintiffs any other relief deemed equitable and just under the circumstances.

D. A determination that there is no justification for delay in enforcement of the judgment on Counts I, II and III.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION AND
WELFARE FUNDS

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Dated: July 24, 2019